

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
Eastern Division**

<hr/>)	Chapter 7
In Re)	
)	
CHRISTEL R. GLASER,)	Case No. 14-10747
)	
Debtor)	
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)	
JOHN J. AQUINO,)	Adv. Proceeding No.: 16-1028
CHAPTER 7 TRUSTEE)	
OF CHRISTEL R. GLASER,)	
)	
Plaintiff)	
)	
v.)	
)	
NATIONSTAR MORTGAGE LLC,)	
)	
Defendant)	
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**JOINT MOTION FOR ENTRY OF ORDER MODIFYING
JOINT PROPOSED DISCOVERY PLAN**

To the Honorable Melvin S. Hoffman, Chief U.S. Bankruptcy Judge:

John J. Aquino, the plaintiff herein and duly appointed trustee of the Chapter 7 estate of Christel R. Glaser (the “Trustee”), and Nationstar Mortgage LLC (“Nationstar”), the defendant in the within adversary proceeding, jointly request that the Court enter an order approving a further brief extension of discovery and related pretrial deadlines in the within adversary proceeding. In support of such request, the parties respectfully represent as follows:

1. The Trustee initiated the within adversary proceeding on February 22, 2016 by the filing of his complaint against Nationstar.
2. Nationstar filed its answer and counterclaim on March 24, 2016, and the Trustee filed his answer to Nationstar's counterclaim on April 14, 2016.
3. At the present time, dispositive motions are to be filed by March 1, 2017, and a joint pretrial memorandum is to be filed by March 23, 2017.
4. As the Court has been advised previously, the parties have engaged in discussions regarding potential resolution of the issues in this adversary proceeding. The parties believe they have reached an agreement in principle regarding settlement of this matter. As such, Trustee's counsel participated in a conference call with the Debtor and her counsel to explain the terms of the anticipated settlement. Thereafter, however, the Debtor retained new counsel who requested an additional conference call with the Trustee to explain the terms of the agreement in principle. That conference call took place on December 22, 2016. Since that time, the parties have prepared draft settlement documents which are presently being reviewed for the purposes of finalizing and filing with the Court. In light of the foregoing, the parties wish to extend the pretrial deadlines for an additional short period to allow for completion of consideration of the presently pending proposal. The parties therefore request a modification of the aforesaid deadlines as follows:

Completion of discovery- March 31, 2017
Dispositive motions filed by: April 17, 2017
Joint Pre-Trial Memorandum: May 1, 2017

WHEREFORE, the parties respectfully pray that the Court:

1. Enter an order extending the pretrial deadlines as set forth herein; and
2. Grant such other and further relief as may be just and proper.

JOHN J. AQUINO,
CHAPTER 7 TRUSTEE,

NATIONSTAR MORTGAGE LLC

By his counsel,

By its counsel,

/s/ Donald F. Farrell, Jr.

/s/ Mark B. Johnson

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Dated: February 28, 2017.